P. HARVARD

O'BRIEN & GERE

October 20, 1992

Mr. Edwin Jackson
Susquehanna Pfaltzgraff Co.
140 East Market Street
York, Pennsylvania 17401

Re: Syracuse China Corporation - Phase I Environmental Liability Assessment

File: 5562.001

Dear Mr. Jackson:

On September 18, 1992, Ms. Anne E. Manning of O'Brien & Gere Engineers, Inc., (O'Brien & Gere) conducted a site inspection as part of a Phase I environmental liability assessment (ELA) of the property owned by Syracuse China Corporation (SCC) located at 2900 Court Street, Syracuse, New York. SCC is a subsidiary of The Pfaltzgraff Co. which in turn is a subsidiary of Susquehanna Pfaltzgraff Co. This work was completed in accordance with O'Brien & Gere's proposal letter dated August 31, 1992 and is intended to identify existing or potential environmental liabilities associated with the property.

The environmental assessment consisted of a visual inspection of the property and surrounding land uses; a review of aerial photographs to document previous land uses; a review of regulatory agency documents for an indication of waste disposal, or unregulated use of the site; and an evaluation of other information obtained during the ELA process regarding land use of the property and of adjacent areas. The field investigation involved an initial site inspection, and consultations with Mr. Philip E. Harvard, SCC's environmental manager.

O'Brien & Gere's assessment has been generally conducted in accordance with the *1989 Guidelines of the American Consulting Engineers Council (ACEC)*, which reflects the current standard of practice in the industry. This assessment does not constitute legal advice or opinion. Also, O'Brien & Gere has not contacted regulatory agencies, at Susquehanna Pfaltzgraff's request, for information regarding SCC's compliance history. Given changing regulatory requirements and the potential legal implications of such an assessment, Susquehanna Pfaltzgraff may wish to consult an environmental attorney as part of the overall review of this assessment.

O'Brien & Gere has conducted previous studies of SCC's property; specifically, a Solid Waste Management Plan dated May 1991, and a Preliminary Hydrogeologic Site Assessment dated April 1990. Information obtained from previous studies will be referenced in this ELA as appropriate. The results and conclusions of this ELA are as follows:

SITE DESCRIPTION

Figure 1 depicts a site location map of SCC's property and Figure 2 depicts a site plan of the property. SCC's property covers an area of approximately 150 acres. The property can be divided into two separate sections: the area of the manufacturing building, and the landfill area. Conrail railroad tracks run east-west between the two areas. The manufacturing building is situated on a 90-acre track of land and is approximately 600,000 square feet in size. The main building is primarily one story. In addition to the main building, a boiler room, two storage buildings, a truck warehouse, two guard houses, and two small sheds are located on the property. The landfill area is located north of the Conrail tracks and of the manufacturing building and is approximately 13 acres of a 59 acre track of land. According to Mr. Harvard, the remaining property consists of wetland areas and open space, some of which is currently used as softball and baseball fields.

Operations at SCC consist of manufacturing of chinaware for domestic and commercial use. According to Mr. Harvard and a letter prepared by C & H Engineers dated May 14, 1992, activities conducted as part of the primary manufacturing process include:

- *Raw material batching.* Raw materials, including calcined alumina, ground quartz, clay and feldspathic rock are loaded into silos. The raw materials are transferred from the silos via air slides into batch mixing facilities where they are blended and filter pressed to form a moldable clay raw material.

- *Ware forming, finishing, and drying.* Moldable clay raw material is extruded and cut into shapes which are then rolled to form the dinnerware shapes. After the ware is formed, the edges are scraped and then the ware is passed through a dryer to evaporate moisture.

- *Ware firing.* The formed ware is fired in kilns to yield biscuit (unfinished) shapes. Biscuit shapes are then decorated and fired again to produce the finished product.

- *Ware cleaning.* The fired ware is cleaned with water to remove calcined alumina, which is applied to the surface of the ware to prevent it from sticking to other pieces of ware during firing.

- *Decal application.* Decals are applied at 22 work stations to the surface of the ware to provide a decorative pattern.

- *Glaze batching and application.* A glaze material is mixed and applied to surfaces of the ware.

- *Overglaze decorating.* Fired glazed ware is passed through an automatic washer to remove surface dust and lint.

Secondary activities include:

- Decorative design studio
- Decal production
- Color preparation and decorating
- Analytical laboratory activities
- Plaster mold making
- Operation of building utility systems
- Equipment cleaning and wash-down
- Employee activities, including restrooms, cafeterias, and shower areas
- Storm water collection and drainage.

The predominant land use in the vicinity of SCC is industrial/residential. Although an Abstract of Title was not available for review by O'Brien & Gere for this ELA, according to Mr. Harvard, the SCC facility was originally built in 1921. Numerous additions have been constructed since. Prior to 1921, the area was farmland. Since 1921, SCC has operated the facility as a manufacturer of chinaware for domestic and commercial use. O'Brien & Gere reviewed aerial photographs from 1959 and 1978 obtained from the U.S. Department of Agriculture, Soil Conservation Service in Syracuse, New York. The aerial photographs did not indicate a change in land use from industrial/residential between 1959, 1978 and the current use.

ENVIRONMENTAL ISSUES

Wastewater: SCC currently uses public water from the Onondaga County Water Authority (OCWA) for all purposes. Wastewater generated at SCC is discharged via three routes: 1) a sanitary sewer, 2) a wastewater treatment system, to a State Pollution Discharge Elimination System (SPDES) permitted outfall (No. NY-010-0137) to Ley Creek, and 3) two storm sewers, one discharging to the wastewater treatment system to the SPDES-permitted outfall, and the other discharging directly to a separate storm sewer that discharges to the Lyncourt storm sewer. The wastewater streams generated from the following processes are discharged to the sanitary sewer:

- Decorative design studio (100 gallons/day [gpd])
- Building utilities from a boiler system (150 gpd)
- Employee activities (26,000 gpd)
- Ware decorating, gold wash-off (100 gpd)
- Ware decorating (500 gpd)
- Ware decal application (100 gpd)
- Glaze Batching and application (1,400 gpd)
- Overglaze decorating (600 gpd)
- Decal production (400 gpd)
- Analytical laboratories (500 gpd).

SCC's wastewater treatment system is located within the landfill portion of SCC's property. Currently, wastewater generated from the following processes is discharged to the wastewater treatment system to the SPDES outfall (001) to Ley Creek:

- Raw material batching (10,000 gpd)
- Ware forming, finishing and drying (20,000 gpd)
- Biscuit ware cleaning (26,000 gpd)
- Plaster mold making (1,200 gpd).

The wastewater treatment system has one principal settling pond and two secondary settling ponds. (An additional principal settling pond exists but has been inactive since 1990). O'Brien & Gere's Preliminary Hydrogeologic Site Assessment indicates that plant effluent is discharged to the principal settling pond. Amerfloc 482, a flocculent which causes suspended solids to settle, is continuously added to the waste stream prior to discharge to the primary settling pond. Prior to 1989, a sludge pond adjacent to the primary settling ponds received sludge from the primary settling ponds. The sludge pond is currently inactive.

Wastewater generated from the following processes is discharged directly to the storm sewer to the SPDES outfall (001) to Ley Creek:

- Building utilities, air compressors and pumps (140,000 gpd)
- Storm water and ground water collection (150,000 gpd).

According to SPDES documentation obtained from SCC, the original SPDES permit was issued in 1980 and renewed in 1985. On March 1, 1990, SCC submitted to the New York State Department of Environmental Conservation (NYSDEC) a SPDES Industrial Permit Application Package, in order to renew its permit. On May 28, 1990, SCC received a Notice of Incomplete Application from NYSDEC. The notice required additional information which SCC supplied August 2, 1990. In response to information sent by SCC to NYSDEC on May 14, 1992 as discussed below, Mr. Harvard was verbally advised by NYSDEC that the agency did have a SPDES permit on file for the facility.

On May 14, 1992, SCC submitted a letter to NYSDEC, including a letter of the same date from C & H Engineers, Inc., indicating that SCC has reevaluated its wastewater collection and treatment processes in order to reduce the level of pollutants introduced to the storm sewer. SCC's letter, which outlines anticipated modifications, descriptions of wastewater contributions and treatment, and wastewater discharge information, is included as Attachment 1. The modifications include the discharge of several wastewater streams into the Onondaga County sanitary sewer system. SCC received verbal approval from the Onondaga County Department of Drainage and Sanitation (OCDDS) in May 1992 to reroute some of its waste streams as soon as proper hookups were able to be made. SCC proceeded to establish the necessary connections to reroute some of its waste to the sanitary sewer.

The wastewater generated and discharged from the processes listed above reflect the modifications for which SCC had received verbal approval. However, according to Mr. Harvard, during the week of September 28, 1992, SCC received a notice of violation for the modifications on the basis that written approval had not been granted. SCC was required to provide OCDDS with additional analytical data for various parameters including metals, oil/grease, volatiles, pH, and xylene by November 1992. SCC conducted sampling the week of October 5, 1992, and will continue to discharge wastewater as indicated above unless OCDDS reviews the analytical data and disapproves of SCC's current connections. O'Brien & Gere received a copy of the preliminary analytical results of the sampling conducted the week of October 5, 1992. Based on a review of the data, it appears that toluene and total xylenes are present. OCDDS currently has no established limits for these parameters, but these parameters may be the subject of further discussion with OCDDS.

Based on O'Brien & Gere's site inspection, review of documentation received from SCC, and consultation with Mr. Harvard, it appears that SCC has demonstrated an effort at evaluating its wastewater streams and complying with applicable regulations, such as submitting the appropriate SPDES permit renewal application. However, O'Brien & Gere is unable to make a final evaluation of environmental liabilities with regard to wastewater until OCDDS responds to the analytical data submitted by SCC.

Storm Water: SCC has two storm water discharge outfalls. One outfall discharges to the Lyncourt storm sewer. The other outfall discharges to the wastewater treatment system that discharges to the SPDES-permitted outfall, as described above, to Ley Creek. Syracuse China retained Sterns & Wheler to prepare and submit the storm water application to NYSDEC by the October 1, 1992 deadline. The application was submitted to NYSDEC by the deadline. A storm water flow schematic prepared by Sterns & Wheler, is included as Attachment 2. According to the application, runoff from the manufacturing building roof, pavement and storage areas (along with process flows as indicated in the wastewater section) are discharged to the outfall via the wastewater treatment system. A paved area (mostly the manufacturing building parking lot) and a shed roof discharge to the other outfall. SCC has demonstrated an effort at evaluating storm water issues and complying with applicable requirements by submitting a storm water application by the October 1 deadline. However, O'Brien & Gere is unable to make a final evaluation of liabilities until NYSDEC responds to the application.

Air Emissions: In accordance with 6 NYCRR Part 201, air emission sources must be permitted through the New York State Department of Environmental Conservation (NYSDEC). An air emission source is defined as an apparatus capable of causing the emission of air contaminants to the outdoor atmosphere. Ventilating systems used for heating buildings for the comfort of people working and living within the building, and bathroom exhaust vents are exempt from permit requirements.

According to Mr. Harvard, Syracuse China has four existing air permits. However, after conducting a preliminary internal audit, SCC recognized the need for additional engineering modifications and recently submitted applications to NYSDEC for seventy-five additional air permits, and

modifications for the existing four. In general, the nature of the point sources for the additional permits are dryer exhausts, kiln exhausts, VOCs in the decorating area, and a few areas with particulate concerns. SCC submitted the applications and modifications on May 14, 1992 and has received a notification of complete application from NYSDEC. NYSDEC has requested that SCC conduct emission testing on two of the point sources for which testing will be used to modify twelve point source applications. According to Mr. Harvard, SCC will conduct the emission testing the week of October 19, 1992. At this time, SCC has not had further communication with NYSDEC. SCC has demonstrated an effort to evaluate potential air emission problems and comply with applicable requirements. However, if NYSDEC does not approve the permits submitted, then SCC may be required to modify current processes. O'Brien & Gere is not able to make a final evaluation of compliance with air issues until NYSDEC issues a final response to the applications.

Solid Wastes: Visual inspection of the property and consultation with Mr. Harvard revealed the presence of a variety of solid wastes. In addition, the Solid Waste Management Plan, dated May, 1991, prepared by O'Brien & Gere on behalf of SCC, provided additional information regarding solid wastes at SCC.

Attachment 3, provided to O'Brien & Gere by SCC, indicates waste streams, type of wastes, approximate annual amount, and disposal mechanisms. Generally, the following solid wastes are generated by SCC:

- *Biscuit china scrap (unfinished product).* Generated during manufacturing, biscuit is composed of fired ceramic shapes which have not yet been decorated and/or glazed. Approximately 2,000 tons/year are generated, the majority of which is recycled as refractory feed stock in Canada; the remaining amount is disposed at the on-site landfill.

- *Glost china scrap (finished product).* The final product of manufacturing, glost is composed of glazed and/or decorated china that has been fired two or more times. Approximately 550 tons/year are generated and disposed on-site. Precious metals, however, are reclaimed by metal reclaimers such as Pease & Curran and Gied.

- *Gypsum mold scrap.* Manufactured at the plant, gypsum molds are comprised of plaster of paris and are used to form ceramic shapes. Approximately 1,000 tons/year are disposed at the on-site landfill.

- *Refractory scrap.* The majority of the refractory scrap is composed of shelves and posts, assembled so that the china can be placed on them before being fired through a tunnel kiln. The material used to make the shelves is magnesium aluminum silicate. Other refractory wastes include castable materials (i.e., brick shapes) which are used to form the cars that carry the shelves and posts through the tunnel kiln. Refractory items have a limited service life due to thermal stress, which causes them to eventually crack and/or warp. Approximately 100 tons/year are generated and disposed at the on-site landfill.

- *Wastewater filter cake.* Suspended solids from various wastewater streams at SCC are removed by a standard plate and frame filter press system, forming a wastewater filter cake. Approximately 700 tons/year are generated and typically disposed at the City of Auburn landfill. However, since the recent (September 1992) closure of the Auburn landfill, SCC is currently accumulating the waste on-site and arranging for the waste to be disposed at the Seneca Meadows landfill.

The remaining solid wastes may be categorized as follows:

- *Wood scrap.* Approximately 50 tons/year are recycled by Cicero Wood Recovery.
- *Metal scrap.* Approximately 50 tons/year are recycled by Roth Steel Corporation.
- *General plant refuse.* Approximately 275 tons/year are hauled off-site by the Onondaga County Resource Recovery Agency.
- *Waste oils.* Approximately 7 tons/year are recycled by Safety-Kleen Corporation.

Based on O'Brien & Gere's inspection, consultation with Mr. Harvard, and review of SCC's Solid Waste Management Plan, issues of non-compliance with solid wastes were not observed. However, a draft consent order was submitted by SCC in October 1990 with the intent of closing the landfill area. As of the date of this ELA, SCC has had no further communication with NYSDEC regarding the consent order.

Hazardous Wastes: Operations at SCC's facility involve the use of materials that result in the generation of hazardous wastes. Hazardous waste generated at SCC include those listed as hazardous in Attachment 4. Also, Attachment 5, provided to O'Brien & Gere by SCC, contains SCC's Generator Annual Report for Calendar Year 1991, as submitted to USEPA. The annual report summarizes hazardous waste management activities throughout 1991. According to the annual report, SCC (EPA Id. No. NYD055865125) is a large quantity generator of hazardous waste and does not maintain hazardous wastes on-site for greater than 90 days. Hazardous wastes reported include: Petroleum naptha (D001, D018, D039), non-halogenated solvents (F003, F005, D001), stillbottoms from recycling of non-halogenated solvents (F003, F005, D007, D008, D001), lead (D008), chromium (D007), and barium (D005). The hazardous wastes are stored in two separate storage areas. One storage area is used for the storage of dry hazardous wastes. Although no drains were observed during the site inspection, secondary containment was not present either. Secondary containment is not required for this waste storage area, but is recommended as good engineering practice. The second storage area is used for storage of flammable wastes. As with the other storage area, no drains were observed, but secondary containment is present in the form of raised curbing.

The annual report summary form indicates that the total amount of hazardous waste generated on-site in 1991 was 1,196 short tons, of which 1,170 short tons was hazardous wastewater. Transporter

and Treatment Storage and Disposal Facilities (TSDFs) for the waste include: 1) Safety-Kleen Corporation (NYD000824581) located in Syracuse, New York, 2) Ashland Chemical (NYD049253719-TSDF and ILD051060408-transporter) of Binghamton, New York, and 3) Laidlaw Environment (MAD000604447) of Lawrence, Massachusetts. Based on O'Brien & Gere's site inspection and review of information obtained from SCC, issues of non-compliance regarding hazardous waste are not anticipated.

Spills: No evidence of spills was observed during the inspection of SCC's property. According to Mr. Harvard, on May 22, 1980, SCC reported a spill of #6 fuel oil to NYSDEC. O'Brien & Gere has also reviewed NYSDEC's Region 7 Spill Report, updated through January 24, 1992, for an indication of spills that may have occurred within the vicinity (one-quarter mile) of SCC's property. O'Brien & Gere reviewed the specific spill records for fourteen spills that may have occurred within the vicinity of SCC property. According to the spill information reviewed, no significant spills have occurred within the vicinity of SCC's property due to the low volume of spilled material and the closed status of the spill files. Based on O'Brien & Gere's review of spill information, potential liabilities with regard to spills are not anticipated.

On-Site Disposal: Since approximately 1940, SCC has been landfilling industrial wastes on a portion of its property currently situated north of the manufacturing building and south of Factory Avenue. The landfill can be divided into two distinct areas: the upper portion, or western half of the landfill, and the lower portion, or eastern half of the landfill. The upper portion of the landfill contains mostly biscuit, gypsum molds, broken china, wastewater treatment sludge, cement, and construction debris. The lower portion contains mostly biscuit, gypsum molds, broken china, refractory material, and some wastewater treatment sludge.

O'Brien & Gere reviewed the NYSDEC Registry of Inactive Hazardous Waste Disposal sites for an indication of compliance history at SCC (see regulatory review section below). The landfill is located approximately 1,700 feet from a school, and residential homes exist within 1,000 feet. Also, the landfill has been used by the City of Syracuse, the Town of DeWitt, and the Town of Salina to dispose materials cleared from storm sewers. In addition, though records do not exist, the public occasionally leaves refuse materials in the landfill, as the landfill area is not completely fenced. Based on O'Brien & Gere's Preliminary Hydrogeologic Site Assessment dated April 1990, samples of sludge contained lead above EP Toxic levels.

On October 14, 1990, Item III of a draft order on consent submitted by SCC to NYSDEC required SCC to develop a Solid Waste Management Plan, which will allow for the continued use of the site for waste management activities until the date of closure of the landfill. In May 1991, O'Brien & Gere developed a Solid Waste Management Plan for SCC to meet the requirements of Item III. The purpose of the order on consent was to initiate closure or a Remedial Investigation/Feasibility Study (RI/FS) of the landfill area. However, at this time, SCC has not had further communication regarding the consent order or RI/FS. SCC has complied with NYSDEC's requirements to date; however, an evaluation of environmental liability is dependent upon NYSDEC's response to the proposed consent order.

Regulatory Agency Review: The following regulatory agency documents were reviewed both for the SCC facility and the Syracuse area:

- USEPA's National Priorities List (NPL), as of July 20, 1992
- NYSDEC's list of Inactive Hazardous Waste Disposal Sites in New York, as of April 1992
- USEPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list of inactive hazardous waste sites, as of January 29, 1992.

The above documents are maintained by O'Brien & Gere and were reviewed at O'Brien & Gere; the regulatory agencies were not contacted. SCC's facility was not indicated on either the NPL nor the CERCLIS lists. However, the Hancock airfield was indicated on the CERCLIS list and is located within one mile of the facility. No sites within one mile were indicated on the NPL. Further investigation of the Hancock airfield would require contacting NYSDEC, which O'Brien & Gere has not done at Susquehanna Pfaltzgraff's request.

The SCC facility is indicated on NYSDEC's Registry of Inactive Hazardous Waste Disposal sites. SCC has been classified as Class 2, which means the site presents a significant threat to public health or the environment and that action is required. The Registry states that the wastewater treatment lagoons on site have shown areas of EP Toxic levels of lead contamination in sludge. Also, surface water sampling has indicated, in addition to lead, the presence of 1,1-dichloroethane and 1,1,1-trichloroethane. According to the Registry, SCC has submitted a consent order to NYSDEC for initiation of an RI/FS of the landfill area. At this time, SCC has not had further communication regarding the consent order or RI/FS. SCC's has complied with NYSDEC's requirements to date, however, an evaluation of environmental liability is dependent upon NYSDEC's response to the proposed consent order.

Asbestos: In December 1989, Galson Technical Services conducted a Phase I Asbestos-Containing Materials (ACMs) assessment on behalf of SCC. The assessment consisted of a review of available building documentation, interviews with building personnel, and a visual survey of the facility. The Phase I survey concluded that between 252 and 507 bulk samples would be required during Phase II in order to positively identify ACM. The report also indicated that if non-friable materials were eliminated from the Phase II sampling plan and assumed to be asbestos, then collection of 252 samples would be required.

According to Mr. Harvard, SCC is aware of the presence of ACM throughout the facility, but did not pursue Galson's Phase II recommendations. Rather, Mr. Harvard indicated that SCC handles asbestos removal activities on the basis of the visual presence of damaged asbestos materials. SCC has retained Marcor of NY Inc. to conduct major removal activities at SCC, specifically stove and pipe insulation, and will continue to conduct asbestos removal activities as considered necessary. According to the National Emission Standards for Hazardous Air Pollutants (NESHAP), which

states that removal of asbestos is only required if a facility is to be demolished or renovated, (40 CFR Part 61), SCC is not required to remove asbestos unless it undergoes demolition or renovation. Based on O'Brien & Gere's site inspection and consultation with Mr. Harvard, non-compliance with asbestos issues is not anticipated.

PCBs: According to documentation provided to O'Brien & Gere from SCC, in 1989 Krause & Heil Inc., removed PCB-contaminated capacitors and transformers. In addition, Krause & Heil installed new non-PCB containing safety switches and capacitors, and three 1500 K.V.A. transformers. Other major transformers on-site include one 5,000 K.V.A. transformer and one standby unit. Numerous smaller transformers also exist, ranging in size to florescent lighting ballasts. Attachment 6 contains documentation of the PCB-contaminated material removal activities, including manifests and certificates of disposal. Based on O'Brien & Gere's site inspection and consultation with Mr. Harvard, non-compliance with PCB issues is not anticipated.

Underground Storage Tanks: Visual inspection of SCC property did not reveal evidence (i.e., fill ports, vents or miscellaneous piping) of below-ground storage tanks, and Mr. Harvard stated there are currently no below-ground tanks. He further stated that seven 20,000-gallon underground tanks were removed between 1985 and 1987; the tanks were originally installed in 1976 and 1977. Four of the tanks contained #2 fuel oil, and three contained kerosene. Mr. Harvard also stated that no evidence of leakage was observed during removal activities. Documentation of removal activities is found in Attachment 7. Based on O'Brien & Gere's site inspection and review of documentation received from SCC, non-compliance with underground storage tank regulations is not anticipated.

Above-ground Storage Tanks: According to Mr. Harvard, SCC was considered a major petroleum facility (7-2120) prior to 1990. SCC previously had four #6 fuel oil above-ground tanks on site. Three of the tanks were 20,000 gallons and one was 10,000 gallons in size. The four tanks were removed between 1988 and 1989. SCC has also permanently closed two 205,000-gallon fuel oil above-ground tanks. In addition, SCC has five 60,000-gallon propane tanks located on-site. Attachment 6 contains the documentation of closure and removal of above-ground tanks. Based on O'Brien & Gere's site inspection and review of documentation received from SCC, non-compliance with above-ground storage tank regulations is not anticipated.

CONCLUSIONS AND RECOMMENDATIONS

O'Brien & Gere's environmental liability assessment was limited in scope as described in our proposal letter dated August 31, 1992. At Susquehanna Pfaltzgraff's request, regulatory agencies were not contacted for information regarding SCC's property.

Based on the information obtained during the course of O'Brien & Gere's environmental liability assessment of SCC's property, it appears that SCC has made reasonable efforts to comply with applicable permit requirements in a timely manner. SCC has also demonstrated an effort to meet NYSDEC's requirements by submitting a draft consent order. SCC has also reevaluated its wastewater discharge streams in order to lower the pollutant levels discharging to its SPDES

permitted outfall, and has evaluated its air emission point sources for the purpose of maintaining compliance with applicable air regulations. However, because of pending wastewater, air, storm water, and draft consent order issues, a complete evaluation of environmental liabilities cannot be made at this time.

Should you have any questions regarding our review of the property, or if we can be of further assistance, please contact me.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.

Cheryl L. Cundall

For/ James T. Mickam, C.P.G.
Vice President

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